



# Proposal to List Chemicals with TLVs >99 ppm in NR 438 - Background

NR 445 Technical Advisory Work Group  
May 25, 2000

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# Proposal to List Chemicals with TLVs >99 ppm in NR 438 - Background

- ◆ Industry representatives expressed concerns that establishing emission standards for chemicals with low toxicity would:
  - be unnecessary and/or redundant to existing regulations for criteria pollutants;
  - add cost to regulation with little or no public health benefits;
  - potentially drive sources to use more toxic chemicals not listed in NR 445



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- ◆ Environmental representatives expressed concerns that listing, rather than establishing emission standards for chemicals with low toxicity would:
  - lead to an increase in use to levels that might cause a public health concern;
  - not provide information at a level of detail necessary to provide adequate protection of public health



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# Proposal to List Chemicals with TLVs >99 ppm in NR 438 - Rationale

- ◆ Department's interest is to do the best job of protecting public health with existing resources:
  - listing in NR 438 at proposed level will allow ability to identify and track sources;
  - site specific follow up will allow ability to require enforceable reductions where needed
  - removes possible disincentives that might encourage a source to use a chemical with more or unknown health and environmental impact